

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications)
and Energy into whether (1) metering, meter maintenance)
and testing, customer billing, and information services) D.T.E. 00-41
should be unbundled; and (2) the service territories of distribution)
companies should remain exclusive, as required by G.L.c. 164)

COMMENTS OF COMPETITIVE RETAIL PROVIDERS

I. Executive Summary

In this document, the Competitive Retail Providers demonstrate that consumers can benefit from having choice of retail providers. The presence of competition in markets creates transparent pricing and incentives to providers to offer better products and services at demand driven prices. Perpetuating the existence of a franchised monopoly provider in metering and billing services will continue to stifle the development and resulting benefits that come from the existence of multiple providers in an environment of customer choice.

Competition in retail energy markets can produce two broad types of benefits to consumers. The first is price efficiencies, and the second is the *superior customer service and other value added benefits*. Historically, the Department has recognized that such benefits exist in other retail markets, and has implied that similar result can be expected

in metering, billing and information systems markets. In order to meet these expectations, Competitive Retail Providers believe that billing and related information services should be unbundled from other services provided by distribution companies and instead, be provided on a competitive basis. Metering and related information services should also be unbundled, however, the unique physical characteristics of metering systems require a different approach.

The Competitive Retail Providers encourage the Department to recognize the consolidated Supplier bill as a key issue in its consideration of competitive retail options. The consolidated Supplier bill will permit customers to drive the development of products at efficient prices. A transformation into a consumer driven market will not occur under the current monopoly provider scenario. In addition, without this option, the competitive commodity market is at a disadvantage because consumers are not keen on receiving two bills and Suppliers find the single Local Distribution Company ("LDC") bill restrictive.

Similarly, metering should be made competitive. The Competitive Retail Providers recognize the technological difficulties and costs of mandating competitive metering on all customers at this point in time. Therefore, we suggest that the Department consider enabling competition for large customers first, followed by smaller customers at some time in the future.

The Competitive Retail Providers suggest several adjustments to the current structure that will enhance the competitive environment in Massachusetts. These include the introduction of the following: improved payment process between LDCs and Suppliers; bill ready information requirements; accurate customer credits for services no longer provided by the LDCs; and standard practices across utility jurisdictions.

II. Introduction

Enron Energy Services, Essential.com, Exelon Energy, Green Mountain Energy Company, InSITE SERVICES, L.L.C., NewEnergy East, L.L.C., and SmartEnergy.com (together "Competitive Retail Providers") are pleased to offer the following comments in response to the Department of Telecommunication and Energy's (herein referred to as the "Department") June 12, 2000 Order opening an investigation into the above referenced proceeding.

Competitive Retail Providers believe that billing and related information services should be unbundled from other services provided by distribution companies and instead, be provided on a competitive basis. This is based on the assumption that in order for the Department to declare a service competitive there must be sufficient competitive alternatives to meet customer needs. We believe that these competitive options exist. Metering and related information services should also be unbundled, however, the unique physical characteristics of metering systems require a different approach.

The following comments respond in narrative form to the questions asked by the Department in its July 11, 2000 Order.

III. Benefits of Competition in Metering and Billing Services

Competition in retail energy markets can produce two broad types of benefits to consumers. The first is price efficiencies, and the second is the *superior customer service and other value added benefits* which is of greatest benefit to residential customers; the class of customers which choice programs have often found are the least likely to participate in competition at this time. When customer service is only available from one source, the incumbent utility, there is no market-based incentive for market participants to provide the best possible customer service, as customers cannot move to another provider of customer service. When customer service related functions are unbundled, making these functions competitive, this will result in market based incentives to provide the best possible customer service.

Interest in replacing traditional regulatory approaches with a competitive retail electricity

market in Massachusetts reflects a trend spanning several industries and jurisdictions. This trend, founded in economic theory, is validated by the historical record of other industries in

which regulators, faced with market and technological change, have embraced competition as a

means to reduce costs and spurring innovation. Some of the successes achieved through

increased reliance on competitive market forces have been recognized by the Department "for example, such functions as billing, metering, coordination with aggregators, provision of backup or Basic Service may, in time, be served competitively." D.P.U. 96-100 at 11; 96-100 (May 1, 1996) at 38, n.29.

For over five years, the Department has sought to bring the benefits of competition to the retail energy markets in Massachusetts. This effort is based on the belief that, over time, competition can reduce prices and spur the development of superior customer service and other value added services. D.P.U. 96-100 (December 30, 1996) at 9. The Department recognized that customer service and value added offerings would be of particular importance to residential customers. *Id.* Early on in the restructuring process, the Department acknowledged that, with the unbundling of utility rates, services other than generation, distribution, and transmission could also be provided on a competitive basis, and that these retail services would be of particular importance to residential customers. *See, e.g.*, D.P.U. 96-100 (May 1, 1996) at 38, n.29; D.P.U. 96-100 (December 30, 1996) at 9. In its landmark order setting forth its plan for restructuring the retail electricity market in Massachusetts, the Department emphasized the potential for consumer benefits in the area of retail services:

As industry participants have started planning operations in a competitive retail environment, many have come to recognize, in addition to and distinct from the physical generation, transmission and local distribution of power, a fourth functional area: retail services. Electric companies have traditionally provided billing services that require extensive metering, communications, and computing technology. In recent years, dramatic advances in the capabilities of these technologies, and precipitous drops in their costs, have spurred entirely new patterns of commerce and, in particular, differentiation and customization in various products and services. Under legal and ratemaking conventions, utilities have been required to treat individual customers as members of large ratepayer classes, subject to treatment on an equal and non-discriminatory basis. Treating customers on a more individual basis was precluded by the high cost of the metering and information systems required for such an approach. However, with the introduction of low-cost information systems and rapid communications, customization of products and services is a prevalent trend in all areas of our economy. Likewise, advocates of competition in retail electric services claim that customization in retail electric energy services promises that the needs and preferences of individual customers may be met more efficiently and at lower costs than was heretofore possible.

This brief review of changes in the economics and technology of the electric industry

indicates that the early 20th century assumptions underlying monopoly regulation no longer conform to the realities of the modern industry. Whereas the regulatory framework succeeded initially in fostering rapid development of the Commonwealth's electric infrastructure, it is not well suited to emerging changes in technology and market conditions. D.P.U. 96-100 (December 30, 1996) at 9-10.

Although the Legislature put a temporary hold on the Department's further consideration of the benefits that competition in the retail functions of billing, metering and information services could bring to consumers, nothing has occurred in the past four years that casts any doubt on the existence of those benefits. Competition in billing, metering and information services can still bring greater value to consumers.

Before this can happen, however, the Department must order the utilities to send the correct price signal to the market regarding the cost of these retail services, which the utilities provide now on a monopoly basis. D.P.U. 95-30 (February 10, 1995) at ii-iii. Price transparency is the critical first step to creating a competitive market. Once competitors know the true cost to the utilities of providing monopoly retail services, they can respond in several ways that will benefit consumers. Firms that can deliver those services more efficiently, through better technology, or economies of scope or scale, can compete directly on the basis of price. Other firms may choose to differentiate themselves by offering value added services such as consolidation of multiple accounts, payment options, flexible bill format and presentation, and data tracking and management. Consumers will then have the choice of staying with utility's basic MBIS offering at the known utility price, or choosing a bundle of energy services from a competitor that provides the greatest overall value. First and foremost, however, the consumer must have accurate pricing information in order to make informed decisions about where true value might lay. The genius of markets is price transparency, and any purported move to a competitive environment without it is doomed to fail.

The unbundling of rates is necessary to provide consumers with accurate price signals and the ability to purchase competitive generation supplies separately from transmission and distribution services. The Department has authority under G.L. c. 164, §§ 76 and 94

to order the unbundling of electric rates, thus enabling the purchase and sale of electricity-related

services in a transparent and comparable manner. D.P.U. 95-30, pp. ii-iii 2/10/95

Competition enabled by rate unbundling and price transparency is also uniquely capable of identifying and developing the innovative products and services that customers have shown time and again they will seek, given the opportunity. There is no evidence to support the idea that the incumbent utilities can provide anything approaching the level of innovation that would be achieved by a competitive market for metering, billing and information services. As the Department itself has recognized, all of the evidence supports the opposite conclusion, that competition will bring products and services unimagined under a monopoly regime, and that those products and services will surprise

and delight customers. It was not so long ago that officials at the former American Telephone and Telegraph Company ("AT&T") were opining gravely that attaching a telephone of other than their making to the public switched network could cause the very network to fail. Now we can hardly imagine modern life without the innovations that have occurred since AT&T was broken up, including the Internet itself, which would not exist but for open access to the public switched network. No utility-mediated process can hope to approach this level of innovation, even with the good faith efforts of all involved. Competitive markets have always shown themselves to be more creative and innovative than any collection of individuals acting by fiat.

IV. Competition in Billing

Current Massachusetts regulations permit two billing options: 1) a dual bill option, where the customer receives a bill from the LDC as well as a bill from the generation Supplier and 2) an LDC consolidated bill where the LDC sends a single bill for its charges as well as generation Supplier services. The introduction of competition in billing in Massachusetts would permit Suppliers to bill and collect for both LDC and Supplier charges directly. Many other states, including, New York, New Jersey, Pennsylvania, California, Delaware, Arkansas, Arizona, Illinois, and Texas have or will institute competitive billing. *See Attachment 1.*

The Competitive Retail Providers recommend the Department permit the single Supplier billing option for three reasons. First, retail electricity customers overwhelmingly prefer single consolidated bills; the "dual bill" option is not attractive to consumers. The only way to get such a bill under the current system is through the utility. Allowing only the utility to provide what customers want puts Suppliers at an unfair competitive disadvantage against the utilities, which should be indifferent to bill payment options, (so long as Supplier consolidated billing puts them in no worse position from a payment and collections perspective). In some LDC service territories, a "two bill" system is available for Suppliers who wish to present their own bills, leaving the LDC to continue to present a T&D bill. This method is confusing for consumers, who prefer to receive one rather than two bills for their energy services. Some companies also wish to present bills electronically to consumers, as many residents find this method of bill presentment more convenient, and the "dual bill" system frustrates consumer desire to use this convenient method of bill payment. Exclusion of the Supplier consolidated billing option impedes the implementation of a choice customers have shown they want.

Second, billing is a form of customer service. Competitive Retail Providers communicate with their customers through bills, just like the LDCs do. Electricity and gas bills, which the customer must read and pay, are the two main points of contact between Suppliers, LDCs, and customers. The bill is the main vehicle for consumers to understand what they have purchased. In addition, bills are often the primary means used by providers to offer new products and services and provide important news to existing customers. Suppliers will need to be able to present bills in order for consumers to be able to choose from innovative product offerings. Allowing a Supplier to present a bill, as opposed to an LDC consolidated bill provides Suppliers the flexibility to provide energy services bundled with other services for the consumer, or pricing plans which protect the consumer against possible price fluctuations in the market. It is normally not possible for Suppliers to provide many of these choices to consumers when the LDC presents the bill. Without the option for Suppliers to present bills to consumers, consumers are prevented from enjoying these innovative possibilities in product choice, and consumers would be restricted from the possibility of choice in how they receive their bill. This again results in fewer reasons for consumers to switch to a Supplier. This makes markets that much less attractive for Suppliers, particularly those who seek to attract residential customers.

Finally, the energy transmission and delivery function which LDCs provide is *the same* for all customers, whether they are full service or served by a Competitive Supplier. Thus, it is not important for the LDC to have the preponderance of contact with the customer through the bill, as the LDC does not need to convey a marketing message to a customer through the bill to differentiate itself from "another LDC" since of course, customers do not have a choice in distribution companies. Suppliers, on the other hand, have a great deal to gain or lose, depending on how they present a bill to a customer, because the very manner in which that bill is presented is such a bill. Since Suppliers are ready and willing to present all state-mandated information that an LDC would need to present in a bill, then state regulations on format, disclosure, and emergency notification would be met no matter which entity presents the bill.

At a minimum, the Commission should require utilities to offer three billing options: the single consolidated Supplier bill option, the two bill option and a utility single bill option. The billing choice lies with the customer, acting through the Supplier. The customer can get the service he or she wants by choosing the Supplier that offers it.

V. Metering

A. Advanced Metering is needed to Achieve the Full Benefits of Electric Competition.

The installation of advanced metering is necessary to achieve the full benefits of electric competition. The benefits of advanced metering include the following:

1. Pricing options

Advanced metering enables Suppliers to offer multiple pricing options, such as time of use rates. This increases the number of choices for customers, and enables them to save money by shifting usage to off-peak periods. This is something customers have taken great advantage of in other competitive industries, such as telephone (5 ¢ Sundays) and airlines (Supersaver fares).

2. Improved reliability and lower prices through customer price response

Over the past two years, power pools from New England to California have experienced very tight conditions during peak summer periods. This has produced extreme price spikes and, in California last month, the need to implement rolling blackouts to preserve system reliability. A major contributing factor to these problems has been the absence of customer price response. The vast majority of customers have no incentive to reduce usage even when wholesale prices spike because customers pay the same price per kWh regardless of when they use electricity.

However, if customers had hourly meters, they would have the opportunity to see and respond to price spikes. This could enable price to bring supply and demand into balance, as it does in other competitive industries, thus improving reliability. Also, customer price response during peak periods would reduce demand in those periods that, in turn, would bring prices down.

3. Improved capacity utilization

The price signals made possible by advanced metering can reduce extreme peaks. In addition, they could also lead to an overall shift of usage to off-peak periods and thus an

increase in the utilization of generating capacity. This will produce true efficiencies and cost savings for all electricity consumers.

4. Enabling load control products and services

Among the greatest consumer benefits from electric restructuring should be the development of a new generation of "behind the meter" products and services. Among the most exciting should be smart devices that see and respond to price signals. Indeed, a number of manufacturers have developed thermostats that do exactly that.

However, without advanced metering, these devices cannot provide benefits to consumers. If the customer is going to be billed based on a monthly kWh read, there is no value to the customer in having a thermostat that automatically responds to hourly price signals. A "smart" appliance is no help if you have a "dumb" meter.

5. Improved accuracy and fairness of settlements

Given that the wholesale market settles on an hourly basis, each customer's usage must be calculated for every hour of every day. Without advanced meters, this is done using statistical load profiles rather than actual recorded usage. All customers within a load profile group are treated the same, even though their actual usage can vary significantly. For example, this can mean that a competitive Supplier whose customers use nearly all their electricity off peak has the same responsibility to the pool as a Supplier whose customers use nearly all of their electricity on peak. With advanced meters, Suppliers would be responsible for the costs that their customers actually impose on the system.

6. Improved forecasting and reduced risk

Suppliers must schedule daily power deliveries to match their customers' usage each day. This requires that Suppliers forecast their customers' daily usage. It is important to forecast accurately. If the forecast is off, the Supplier can be subject to imbalance charges, which result in costs to the Supplier that must ultimately be passed on in prices to customers.

The accuracy of forecasting would be greatly improved if daily meter reads were available. Yesterday's usage is the best predictor of tomorrow's. Having to forecast based on monthly meter reads increases inaccuracy, risk, and costs to Suppliers and customers.

A. The Current Regulatory System has Failed to Deliver Advanced Metering.

To date, the current regulatory system has failed to deliver advanced metering. In the twenty-first century, in a high-tech state that the Governor likes to call the "dot-Commonwealth, the vast majority of customers have

meters and meter reading systems that use 1930s technology. In an era when meters can be read automatically, every hour via telephone, radio networks, paging networks, and the Internet, our meters are read manually, or estimated, once a month.

Metering is not competitive, so competitive firms cannot provide advanced meters to their customers. However, the Department and Legislature have indicated that metering *might* become competitive in the future. Accordingly, utilities cannot take the risk of installing advanced meters because they do not know whether they will be able to recover the cost. We are in a condition where no one can act, and customers lose out as a result. Unless a clear decision is made on competitive metering, the paralysis will continue.

B. Make Metering Competitive for Large Customers.

The best way to bring the benefits of advanced metering to customers is to make metering competitive. As the New York Public Service Commission stated in its order making metering competitive, "The introduction of competition into metering services can lower long term costs, increase customer choices, encourage economic growth, stimulate innovation, and shift more of the risks of investments to providers." Order Providing for Competitive Metering, NY PSC Case 94-E-0952, p. 7 (June 16, 1999).

For these reasons, many states have made metering competitive, at least for large customers. States that have opted for competitive metering include: New York, California, Illinois, Texas, Nevada, Arizona, and Maine. Metering is also competitive in several utility service territories in Pennsylvania.

Competitive Retail Providers advocate competition in metering for small customers. However, we recognize that opening competition to those customers significantly adds to the complexity of the effort. Therefore, we recommend that Massachusetts begin with metering competition for large customers, and then move to competition for smaller customers once competitive metering for large customers is fully established.

VI. Implementation and Other Administrative Issues

IV.

V. A.Payment of receivables

There are two payment methodologies available in a single bill model (LDC or Supplier consolidated). The Competitive Retail Providers recommend the Department to permit the billing party (Supplier or LDC) to determine which of the two methodologies it prefers. Notably, the national EEI, CUBR, NEM, EPSA sponsored UBP group has agreed that the choice of the two options is the preferred way to address the payment issue.

The "Purchase Receivables" option requires the billing party to purchase receivables from the non-billing party, thus the non-billing party receives its payment regardless of what is collected from the customer. In this method, the non-billing party (LDC or Supplier) is relieved of normal collection activities and associated liability. Under this model, the billing party should be entitled to some discount off the actual face value of the aggregated receivables commensurate with a pre-determined uncollectibles rate. Although one could make the argument that the receivables should be assumed at the full 100% value, we recommend the rate be set at least equal to the average uncollectible rate experienced by the LDC in prior years.

The alternative, "Pay-as-You Get Paid" option, enables the billing party to pay the non-billing party for receivables collected from the customer using a payment priority. This means that in cases where customers do not pay a bill, or only pay part of their outstanding balance, that the billing and non-billing parties both receive funds in a pre-determined order.

In parallel with the payment methodology, Competitive Retail Providers urge the Department to consider the order in which customer payments are applied to outstanding balances when less than the full amount is received in a single bill scenario (currently, only the single LDC bill in Massachusetts). This rule is known as "payment order" for partial payments. The method chosen for application with Supplier consolidated billing has major impact on Suppliers. Customers also have a stake in this issue. For example, Massachusetts customers receiving LDC consolidated billing may face overdue notices with Suppliers, even if they are current by order of payment. Based on experience in other markets that provide for Supplier consolidated billing, Suppliers recommend the following order be followed for application of partial payments from a customer:

- Utility past-due charges (oldest to youngest) 1st;
- Supplier past-due charges (oldest to youngest) 2nd;
- Billing party current charges 3rd and
- Non-billing party current charges 4th.

This payment order recognizes the importance of avoiding situations that will lead to physical shut-off or other contractual penalties that may be charged to the customer for late payment by applying any funds received to the utility past-due amount first. In a partial payment situation, the LDC is first in payment order, unless the LDC is not the billing party. Only in that case would the LDC then be second in payment order until the first 30 days have expired. In this case, if the LDC is not the Billing Party, the moment T&D charges become past due because of a partial payment by a customer, the LDC will once again be first in payment order for Past Due charges.

Competitive Providers are opposed to the current practice of applying partial payment to utility past due and current charges followed by Supplier past-due and current charges. Under this system, the Supplier would be required as the billing party to send funds received from the customer to the utility to satisfy both past due and current before being able to retain any payment for itself. The potential negative impact of this scenario is shown in the Example #1 in Attachment 2. *See* Attachment 2. Attachment 2 demonstrates how payments would be applied under the two payment order methodologies described above. When the recommended payment order is applied in Example #2, the customer's account is current with both the Supplier and the utility versus the situation in Example #1 where the customer is current with the utility and has exceeded 90 days past due with the Supplier. Even though the customer is making the same payments in each example, Example #1 leads to one party being unfairly subject to a greater burden of past-due charges. A situation that would most likely lead to the customer being returned to default service for non-payment.

The recommended payment order application will result in less customer confusion since customers are used to having payments made to vendors applied to the oldest outstanding charges first. It will result in less collection activities exercised against the customer since the past-due balances that lead to collection activity by either the Supplier or the utility are minimized. The use of the recommended payment order application will decrease the likelihood of the Supplier exercising its right to return a customer to default service for non-payment and the customer perception that they have made payments in a fairly timely manner.

In addition to the above reasons for considering the recommended partial payment order application, the DTE should also consider that Massachusetts Electric Company (National Grid) recently announced it was switching to this recommended payment order for utility consolidated billing in its territory in response to customer and Supplier complaints about problems and confusion created by the other payment order method. In

National Grid's case, where the LDC is the billing entity, the LDC's current charges would be third in the payment order. It is clear that the recommended partial payment order method is the most fair and equitable way to deal with partial payments. This method respects the need to avoid customer shut-off and reduces customer confusion. For these reasons, Suppliers strongly encourage the DTE to consider, as part of the metering, billing and information services proceeding, incorporating a change for utility consolidated billing that would mandate the recommended partial payment order described above.

B. Bill ready Information Requirements

In a single bill scenario, whether the Supplier or the LDC is sending the bill, the Competitive Retail Providers strongly recommend that the Department implement a "bill ready" rule. Under existing utility requirements in Massachusetts, Suppliers are required to provide utilities with rate tables and then the LDC calculates the bill. Often Suppliers are required to provide LDCs with rate tables well in advance of market opening and there are lengthy notification requirements. This model is very limiting as it restricts providers from offering creative products and pricing structures. In the case of Supplier consolidated billing, a non-bill ready rule would require a Supplier to perform an exuberant amount of programming to support the extensive number of pricing tariffs used by each utility. We urge the Department to implement a bill ready scenario in which the non-billing party would provide the billing party with its customer charges on a monthly basis (or whatever the billing cycle period is).

C. Customer Credits

As described above, price transparency is a key factor for the introduction of competition. Likewise, customers who choose a Supplier of competitive services must see credits that accurately reflect the cost of service no longer provided by the LDC. The establishment of such credits does not have to be borne through a complicated administrative proceeding. For example, credits could be based on most recent year charges for such services. The most important principle for the Department to institute is to ensure that customers are not charged twice for the same service.

D. Uniformity

The application of uniform business practices is widely recognized as a key enabler for developing a robust competitive energy market. Competitive Retail Providers strongly encourage the Department to mandate uniform application of the business practices established through the metering, billing and information services proceeding in all LDC territories. This will reduce barriers of entry and avoid customer confusion by allowing Suppliers to create commons systems and operations that can be utilized for all customers in Massachusetts. In addition, there are several efforts underway in the industry that are developing guidelines for many of the business practices included in the scope of the metering, billing and information services order. Competitive Retail Providers strongly encourage that the DTE investigate the applicable findings of the following efforts as part of its development of a final order: Coalition for Uniform Business Rules (www.cubr.org) and Uniform Business Practices (www.ubp.org).

Respectfully submitted,

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Attachment 1

Consolidated Billing Status

State	<u>Order/ Docket #</u>	<u>Status</u>	<u>Comments</u>
Arizona	Legislation	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	ESP consolidated bill will be implemented when EDI standards are finalized
Arkansas	Docket No. 00-054-U; Order No. 10; 6/30/00	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	
California	Docket No. 97-05-039; 5/6/97	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	
Delaware	Docket No. 49; 8/31/99	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	Phased in through 2000
Illinois	Docket No. 99-0013; 12/22/99	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	Phased in through 2002

Maryland	OrderNo. 75722; Case No. 88738; 10/29/99	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	
Montana	S.B. 390	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	
Nevada	Docket No. 97- 8001; 6/4/98	Any licensed ESP; the EDC is prohibited from billing	The Single Retailer Model is used here
New York	Case No. 99-M- 0631; 3/22/00	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	
New Jersey	Legislation No. A-16	Separate bills from EDC or ESP; consolidated bill from EDC	Docket No. EX99090676 is ongoing at this time; a consolidated ESP bill option is anticipated
Ohio	S.B.3;Legislation	PUCO must initiate a proceeding by 3/3//03 to determine if billing and metering should be competitive services	Individual utility Stipulations specify plans for implementing consolidated EDC and ESP billing
Oregon	S.B. 49	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	Nonresidential at this time
Pennsylvania	Separate Utility Orders	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	Docket M-00960890 & its Appendix A describe the process.
Texas	S.B 7	Any licensed REP; the EDC is prohibited from billing	Single Retailer Model is used in Texas. The REP provides all customer care functions except metering
Virginia	NOPR issued by PUC	Separate bills from EDC or ESP; consolidated bill from ESP or EDC	Proposed to begin 1/1/02

EDC – Electric Distribution Company

ESP – Electric Supply Provider

REP – Retail Electric Provider